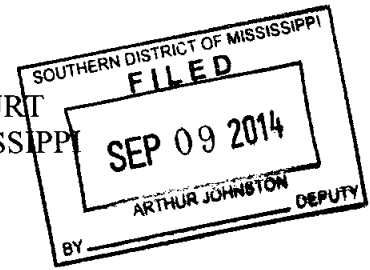


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:14-cr-65-LG-RHW

JOHN MACK BROWN

18 U.S.C. § 1001

The Grand Jury charges:

COUNT 1

That on or about October 12, 2009, in Hancock County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **JOHN MACK BROWN**, did knowingly and willfully make and cause to be made, and use and cause to be used, a false writing or document in a matter within the jurisdiction of the United States Navy, part of the Department of Defense, by submitting a "travel voucher" document known as a DD Form 1351-2, which he knew contained a false and fraudulent statement of material fact inasmuch as the defendant created and attached fraudulent receipts for expenses associated with U.S. Government aircraft landing fees, parking fees, and security services totaling \$9,940.00 when in truth and in fact he knew that no such expenses had been incurred.

All in violation of Section 1001, Title 18, United States Code.

COUNT 2

That on or about October 12, 2009, in Hancock County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **JOHN MACK BROWN**, did knowingly and willfully make and cause to be made, and use and cause to be used, a false

writing or document in a matter within the jurisdiction of the United States Navy, part of the Department of Defense, by submitting a "travel voucher" document known as a DD Form 1351-2, which he knew contained a false and fraudulent statement of material fact inasmuch as the defendant created and attached fraudulent receipts for expenses associated with U.S. Government aircraft takeoff and landing fees, parking fees, ground handling fees, security services, and other line items totaling \$5,550.00 when in truth and in fact he knew that no such expenses had been incurred.

All in violation of Section 1001, Title 18, United States Code.

COUNT 3

That on or about November 14, 2009, in Hancock County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **JOHN MACK BROWN**, did knowingly and willfully make and cause to be made, and use and cause to be used, a false writing or document in a matter within the jurisdiction of the United States Navy, part of the Department of Defense, by submitting a "travel voucher" document known as a DD Form 1351-2, which he knew contained a false and fraudulent statement of material fact inasmuch as the defendant created and attached fraudulent receipts for transit service fees totaling \$2,865.00 when in truth and in fact he knew that no such expenses had been incurred.

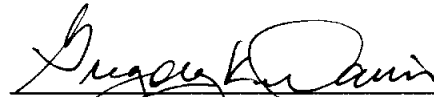
All in violation of Section 1001, Title 18, United States Code.

COUNT 4

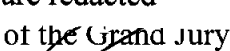
That on or about January 9, 2010, in Hancock County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **JOHN MACK BROWN**, did knowingly and willfully make and cause to be made, and use and cause to be used, a false writing or document in a matter within the jurisdiction of the United States Navy, part of the

Department of Defense, by submitting a "travel voucher" document known as a DD Form 1351-2, which he knew contained a false and fraudulent statement of material fact inasmuch as the defendant created and attached fraudulent receipts for expenses associated with U.S. Government bus transport fees totaling \$4,855.00 when in truth and in fact he knew that no such expenses had been incurred.

All in violation of Section 1001, Title 18, United States Code.


GREGORY K. DAVIS
United States Attorney

A TRUE BILL:

s/signature redacted
Foreperson of the Grand Jury


This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 9th day of September, 2014.


UNITED STATES MAGISTRATE JUDGE